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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FEB 25 1993

REPLY TO THE ATTENTION OF:

Linda Bullen, Esq.
McDermott, Will & Emery
227 West Monroe Street
Chicago, Illinois 60606-5096

CS-3T

Michael Steinberg, Esq.
Morgan, Lewis & Bockius
1800 M Street, N.W.
Washington, D.C. 20036

Re: United States v. Selmer, et al. -- Revised Work Plan

Dear Linda and Michael:

In response to your letter of February 16, 1993, U.S. EPA and the Department of Justice (together, "the United States") want to communicate that we, too, were hopeful that the most recent work plan for the Selmer Site would have been the last, but because this draft fails to reflect some important changes to the work plan that the United States believes are necessary, and which were communicated to your contractor in the comments on the last draft work plan, the United States cannot agree to accept this as the final work plan. I believe that Ken Theisen has verbally relayed the remaining concerns, identified below, to Scott Dennis. Because Ken is out of town, however, I am putting his comments to paper, so that some of the apparent confusion that has been realized in the past can be avoided.

In an effort to settle the remaining issues and to expedite the study at the Site, the United States is willing to forego requiring installation of deep wells as part of Phase II. We must insist, however, upon the better sampling techniques we requested, especially since we are now not going to have the benefit of deep samples.

According to U.S. EPA technical staff, your contractor's assertion that studies of sampling devices support the use of bailers for purposes of this study may be correct for studies done some time ago. Within the past 3-5 years, most recent studies have concluded the exact opposite. The low-flow, positive displacement sampling pumps will provide better and more consistent results than bailers, especially at low concentrations. Bailers may be adequate if high concentrations of contaminants are expected, or if the aquifer is of such a low permeability that a sampling pump cannot be used because of

insufficient recharge rates. U.S. EPA's technical staff believes neither of these apply to this Site. I am sending copies of the relevant studies to Mr. Dennis, along with a copy of this letter.

Additionally, U.S. EPA staff agree that using a brass liner to obtain a soil sample that is transferred in the field into a bottle would volatilize the soils the same as if no brass liner is used. However, U.S. EPA's comment was that the brass liner should be used **and immediately sealed** on site. The liner is not opened until reaching the laboratory and is ready for analysis. This minimizes the loss of volatiles by reducing one handling step (that of transferring from the split spoon into the bottle).

Finally, no mention was made of the taking and recording of water levels during the investigation from the monitoring wells. This is important in determining the flow direction at the time of sampling to determine whether the monitoring wells were placed properly.

Should your clients and Mr. Scott take the position that the work plan should not be revised as outlined above, or that it should incorporate only part of the above, I would suggest that we have a conference call to settle the matter prior to submitting another revised draft that does not address the United States' concerns.

Sincerely,

Elizabeth O. Murphy

Elizabeth O. Murphy

Enclosure

cc: Frank Bentkover
Ken Theisen
Scott T. Dennis